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FINDING OF NO SIGNIFICANT IMPACT

- 1. NAME OF ACTION: Construct a Standard Air Munitions Packages (STAMP) Maintenance and Inspection (M&I) Facility at Hill Air Force Base (AFB), Utah.
- 2. **DESCRIPTION OF THE PROPOSED ACTION:** Hill AFB proposes to accommodate current United States Air Force (USAF) missions by constructing an adequately sized STAMP M&I facility providing drive-through capability and an enclosed wash rack, and consolidating operations of the munitions squadron (649 MUNS) in a single facility. The proposed action would be located in an approved munitions and missile storage (MAMS) area on Hill AFB.
- **3. SELECTION CRITERIA:** The following criteria were used to assemble alternatives. The facility that provides STAMP M&I capabilities on Hill AFB should:
 - provide a large enclosed area (40,000 square feet) for assembly of munitions
 pallets and performing inspections using work bays large enough for drivethrough capability;
 - accommodate both current and projected new weapon workloads;
 - have 2.5 acres (approximate value) of adjacent land suitable for a munitions staging area, an adjacent enclosed wash rack, a parking lot, and an access road;
 - be located within the Hill AFB munitions storage area; and
 - be protective of facilities, human health, and the environment.

4. ALTERNATIVES CONSIDERED OTHER THAN THE PROPOSED ACTION:

Under the no action alternative, the STAMP M&I facility would not be constructed, and severe space and work flow limitations would continue to exist.

Renovating and expanding the existing facilities was considered and eliminated by the Hill AFB planners and engineers. Because the estimated cost for this alternative exceeded 70 percent of the real property value of the existing facilities, pursuing this alternative would have violated current USAF real property policies.

Other locations were considered by the Hill AFB explosive safety office. The MAMS areas are the only locations on Hill AFB where storage of munitions is permitted. The proposed location was selected to provide maximum possible protection to personnel and property from the damaging effects of potential accidents involving ammunition and explosives. A management information system was used to determine the best location, based on explosive quantity-distance(QD) separation criteria. The proposed location represents the only area in MAMS with sufficient space to construct approach aprons and turn-around pavements allowing large flatbed trucks to drive into the STAMP M&I assembly warehouse portion of the facility, to be subsequently loaded with pallets, drive out the other side, and exit the facility.

5. SUMMARY OF ANTICIPATED ENVIRONMENTAL EFFECTS:

Issue	Alternative A No Action	Alternative B Proposed Action
Air Quality	No effects	Construction equipment would create temporary emissions. Fugitive dust emissions would be mitigated. Air emissions from cans of spray paint would be approximately 0.1 tons per year of volatile organic compounds (VOCs).
Solid and Hazardous Waste	No effects	If contaminated soils are identified, they would be properly handled during the construction process. Operational activities would generate uncontaminated trash and domestic sewage. Solid and liquid wastes containing regulated substances would all be properly contained, stored, transported, disposed, re-used, and/or recycled. Wastewater would be treated by North Davis Sewer District (NDSD).
Biological Resources	No effects	Site habitat has been previously degraded by human activities. The proposed action would reduce available forage for birds and displace rodents. Without mitigation, construction activities would increase the chance of introducing additional invasive species. No trees would be removed. If any protected nesting birds should exist adjacent to construction activities, a certificate of registration would have to be obtained. Restoration planting (of any areas not occupied by structures, pavements, or irrigated turf) would include fire resistant plants, native grasses, and native shrubs.
Water Quality	No effects	During construction and operations, water quality would be protected by implementing stormwater management practices. Predevelopment hydrologic characteristics would be preserved. Facility runoff would be handled in such a manner that increased bird activity would not be encouraged.

6. FINDING OF NO SIGNIFICANT IMPACT: Based on the above considerations, a Finding of No Significant Impact (FONSI) is appropriate for this assessment.

Date: 20090709

Approved by:

HARRY BRIESMASTER III, YF-03, DAF Director, 75th Civil Engineer Group



Hill Air Force Base, Utah

Final

Environmental Assessment:

Proposed Standard Air Munitions Packages Maintenance and Inspection Facility,

Hill Air Force Base, Utah

July 9, 2009

Final

Environmental Assessment (EA): Proposed Standard Air Munitions Packages Maintenance and Inspection Facility, Hill Air Force Base, Utah

Contract F42650-03-D-0007, Delivery Order #0033

Department of the Air Force Air Force Materiel Command Hill Air Force Base, Utah 84056

July 9, 2009

Prepared in accordance with the Department of the Air Force Environmental Impact Analysis Process (EIAP) 32 CFR Part 989, Effective July 6, 1999, which implements the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) regulations.

EXECUTIVE SUMMARY

Purpose and Need

The purpose of the proposed action is to provide an adequately sized standard air munitions packages (STAMP) maintenance and inspection (M&I) facility located within the Hill Air Force Bas (AFB) munitions storage area, with drive-through capability and an adjacent enclosed wash rack, enabling all required activities to occur safely, while satisfying prescribed time constraints.

A new facility in needed to replace the existing outdated and undersized facility. The current facility was originally built for other purposes over 60 years ago. It is unsuitable for current workloads, and cannot accommodate projected new weapon workloads because the work areas are both too small and too few in number. Providing a new facility would increase readiness and reduce work flow time by consolidating all munitions operations in a single facility, closer to existing munitions storage facilities.

Scope of Review

During a scoping meeting and subsequent interactions, the following environmental issues were addressed:

- air quality,
- solid and hazardous wastes (including liquid waste streams),
- biological resources,
- geology and surface soils,
- water quality,
- cultural resources,
- occupational safety and health,
- air installation compatible use zone (AICUZ), and
- socioeconomic resources.

As explained in the body of this document, the issues that were identified for detailed consideration are: air quality, solid and hazardous wastes (including liquid waste streams), biological resources, and water quality.

Selection Criteria

The facility that provides STAMP M&I capabilities on Hill AFB described in this document should:

- provide a large enclosed area for assembly of munitions pallets and performing inspections using work bays large enough for drive-through capability;
- accommodate both current and projected new weapon workloads;
- have 2.5 acres of adjacent land suitable for a munitions staging area, an adjacent enclosed wash rack, a parking lot, and an access road;
- be located within the Hill AFB munitions storage area; and

• be protective of facilities, human health, and the environment.

Alternatives Considered in Detail

<u>Alternative A (No Action Alternative)</u> - Under the no action alternative, the STAMP M&I facility would not be constructed, and severe space and work flow limitations would continue to exist.

<u>Alternative B (Proposed Action - Construct STAMP M&I Facility)</u> - The proposed STAMP M&I facility would be located within the Hill AFB munitions storage area of Hill AFB. The components of the proposed action would include:

- constructing a single story structure with four M&I bays, one large STAMP assembly bay, offices, restroom and shower areas, a break/conference room, a mechanical equipment room, and storage areas;
- providing two oil-water separators inside the structure;
- supplying an outdoor munitions staging area, a parking lot, and an access road:
- constructing an adjacent enclosed wash rack for pressure washing munitions trailers;
- routing power to the facility;
- providing a generator for emergency backup power;
- installing buried steam and condensate lines;
- providing connections to remaining buried utilities; and
- potentially rerouting two existing water lines.

Decisions That Must Be Made

Hill AFB must decide whether to:

- not provide a STAMP M&I facility (no action), or
- construct a STAMP M&I facility.
- If the decision is to provide a STAMP M&I facility, then a decision must be made as to where the facility will be located.

If Hill AFB decides to construct a STAMP M&I facility, the proponent and environmental managers would then decide what mitigation and/or monitoring measures, if any, should be implemented.

Results of the Environmental Assessment

Alternatives A and B were considered in detail. The results of the environmental assessment are summarized in the following table.

Summary Comparison of Alternatives

Issue	Alternative A No Action	Alternative B Proposed Action
Air Quality	No effects	Construction equipment would create temporary emissions. Fugitive dust emissions would be mitigated. Air emissions from cans of spray paint would be approximately 0.1 tons per year of volatile organic compounds (VOCs).
Solid and Hazardous Waste	No effects	If contaminated soils are identified, they would be properly handled during the construction process. Operational activities would generate uncontaminated trash and domestic sewage. Solid and liquid wastes containing regulated substances would all be properly contained, stored, transported, disposed, re-used, and/or recycled. Wastewater would be treated by North Davis Sewer District (NDSD).
Biological Resources	No effects	Site habitat has been previously degraded by human activities. The proposed action would reduce available forage for birds and displace rodents. Without mitigation, construction activities would increase the chance of introducing additional invasive species. No trees would be removed. If any protected nesting birds should exist adjacent to construction activities, a certificate of registration would have to be obtained. Restoration planting (of any areas not occupied by structures, pavements, or irrigated turf) would include fire resistant plants, native grasses, and native shrubs.
Water Quality	No effects	During construction and operations, water quality would be protected by implementing stormwater management practices. Predevelopment hydrologic characteristics would be preserved. Facility runoff would be handled in such a manner that increased bird activity would not be encouraged.

Identification of the Preferred Alternative

Hill AFB prefers Alternative B (the proposed action).

TABLE OF CONTENTS

1	Pu	rpose of and Need for Action	1
	1.1	Introduction	1
	1.2	Purpose of the Action	
	1.3	Need for the Action	1
	1.4	Alternative Selection Criteria	3
	1.5	Relevant Plans, EISs, EAs, Laws, Regulations, and Other Documents	4
	1.6	Decisions That Must Be Made	
	1.7	Scope of this Environmental Analysis	6
	1.7	7.1 History of the Planning and Scoping Process	6
	1.7	7.2 Issues Studied in Detail	6
	1.7	7.3 Issues Eliminated From Further Study	8
	1.8	Applicable Permits, Licenses, and Other Coordination Requirements	9
2.0	Al	ternatives, Including the Proposed Action	11
	2.1	Introduction	
	2.2	Process Used to Develop the Alternatives	
	2.3	Description of Alternatives	
		3.1 Alternative A: No Action	
	2.3	3.2 Alternative B: Proposed Action - Construct a STAMP M&I Facility	
	2.3	3.3 Alternatives Eliminated From Detailed Study	
		2.3.3.1 Renovating and Expanding	
		2.3.3.2 Other Locations	12
	2.4	Summary Comparison of Alternatives and Predicted Achievement of	
		Project Objectives	13
	2.4	4.1 Summary Comparison of Alternatives	13
	2.4	4.2 Summary Comparison of Predicted Achievement of Project Objectives	s13
	2.5	Identification of the Preferred Alternative	13
3.0	Af	fected Environment	14
	3.1	Introduction	14
	3.2	Description of Relevant Facilities and Operations	
	3.3	Description of Relevant Affected Issues	
	3.3	1	
		3.2 Solid and Hazardous Wastes	
	3.3	3.3 Biological Resources	
	3.3	3.4 Water Quality	
	3.4	Description of Relevant Pre-Existing Environmental Factors	
	3.5	Description of Areas Related to Cumulative Effects	20

4.0	En	vironment	al Consequences	21
4.	1	Introduction	on	21
4.2	2		Effects to Relevant Affected Resources of All Alternatives	
	4.2	.1 Predict	ed Effects to Air Quality	21
		4.2.1.1	Alternative A: No Action	21
		4.2.1.2	Alternative B (Proposed Action): Construct a STAMP M&I	
			Facility	21
	4.2	.2 Predict	ted Effects to Solid and Hazardous Waste	23
		4.2.2.1	Alternative A: No Action	23
		4.2.2.2	Alternative B (Proposed Action): Construct a STAMP M&I	
			Facility	23
	4.2	.3 Predict	ed Effects to Biological Resources	25
		4.2.3.1	Alternative A: No Action	25
		4.2.3.2	Alternative B (Proposed Action): Construct a STAMP M&I	
			Facility	
	4.2		ed Effects to Water Quality	
		4.2.4.1	Alternative A: No Action	26
		4.2.4.2	Alternative B (Proposed Action): Construct a STAMP M&I	
			Facility	
4.3	3	Summary (Comparison of Predicted Environmental Effects	28
5.0	Lis	t of Prepai	rers	29
6.0	Lis	t of Person	s and Agencies Consulted	30
7.0				
7.0	110			
			LIST OF FIGURES	
Figure	e 1: 1	Location of	the Proposed Action on Hill AFB	2
Figure	e 2:]	Proposed S'	TAMP M&I Facility Location	3
_			h National Ambient Air Quality Standards, Areas of Non-Attain	
Figure	e 4: ;	State of Uta	th Areas of Non-Attainment for PM-2.5	16

LIST OF TABLES

Table 1:	Summary Comparison of Predicted Achievement of Project Objectives	13
Table 2:	Baseline Criteria Pollutants and HAPs (tons/year)	17
Table 3:	Invasive Species Currently Present	18
Table 4:	Birds That Could Occupy Trees of Hill AFB Urban Forest	19
Table 5:	Calculated Heavy Equipment Emissions	22
Table 6:	Summary Comparison of Predicted Environmental Effects	28

LIST OF APPENDICES

Appendix A: Cultural Resources Finding of No Adverse Effect

LIST OF ACRONYMS AND CHEMICAL TERMS

AFB	Air Force Base
AFOSH	Air Force Occupational Safety and Health
AICUZ	Air Installation Compatible Use Zone
ALC	Air Logistics Center
APE	Area of Potential Effect
bgs	Below the Ground Surface
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CFR	Code of Federal Regulations
СО	Carbon Monoxide
CWA	Clean Water Act
DAQ	Division of Air Quality (Utah)
dBA	Decibel (A-weighted)
DOD	Department of Defense (United States)
DRMO	Defense Reutilization and Marketing Office
EA	Environmental Assessment
EIAP	Environmental Impact Analysis Process
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EPA	Environmental Protection Agency (United States)
FONSI	Finding of No Significant Impact
FQI	Floristic Quality Index
HAP	Hazardous Air Pollutant
M&I	Maintenance and Inspection
MBTA	Migratory Bird Treaty Act
MILCON	Military Construction
MS4	Municipal Separate Storm Sewer Systems
NAAQS	National Ambient Air Quality Standards
NDSD	North Davis Sewer District
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act

NO _x	Oxides of Nitrogen
NRHP	National Register of Historic Places
O ₃	Ozone
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PM-10	Particulates Smaller Than 10 Microns in Diameter
PM-2.5	Particulates Smaller Than 2.5 Microns in Diameter
RCRA	Resource Conservation and Recovery Act
RHI	Range Health Index
ROD	Record of Decision
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SOC	Species of Concern (State of Utah)
SO_x	Oxides of Sulfur
STAMP	Standard Air Munitions Packages
SWPPP	Stormwater Pollution Prevention Plan
UAC	Utah Administrative Code
UPDES	Utah Pollutant Discharge Elimination System
USAF	United States Air Force
USC	United States Code
VOC	Volatile Organic Compound
WCI	Wildlife Community Index
WFRC	Wasatch Front Regional Council

1 PURPOSE OF AND NEED FOR ACTION

1.1 Introduction

Hill Air Force Base (AFB) is located approximately 25 miles north of downtown Salt Lake City and seven miles south of downtown Ogden, Utah (Figure 1). Hill AFB is surrounded by several communities: Roy and Riverdale to the north; South Weber to the northeast; Layton to the south; and Clearfield, Sunset, and Clinton to the west. The base lies primarily in northern Davis County with a small portion located in southern Weber County.

Hill AFB is an Air Logistics Center (ALC) that maintains aircraft, missiles, and munitions for the United States Air Force (USAF). In support of that mission, Hill AFB: provides worldwide engineering and logistics management for the F-16 Fighting Falcon and A-10 Thunderbolt; accomplishes depot repair, modification, and maintenance of the F-16, A-10 Thunderbolt, and C-130 Hercules aircraft; and overhauls and repairs landing gear, wheels and brakes for military aircraft, rocket motors, air munitions, guided bombs, photonics equipment, training devices, avionics, instruments, hydraulics, software, and other aerospace-related components.

The mission of the 649 Munitions Squadron (649 MUNS) is to receive, store, maintain, inspect, test, account for, and ship over 3,800 standard air munitions packages (STAMP) per year from Hill AFB to USAF recipients worldwide.

1.2 Purpose of the Action

The purpose of the proposed action is to provide an adequately sized STAMP maintenance and inspection (M&I) facility located within the Hill AFB munitions storage area, with drive-through capability and an adjacent enclosed wash rack, enabling all required activities to occur safely, while satisfying prescribed time constraints.

1.3 Need for the Action

A new facility in needed to replace the existing outdated and undersized facility. The current facility was originally built for other purposes over 60 years ago. It is unsuitable for current workloads, and cannot accommodate projected new weapon workloads because the work areas are both too small and too few in number. Providing a new facility would increase readiness and reduce work flow time by consolidating all munitions operations in a single facility, closer to existing munitions storage facilities.

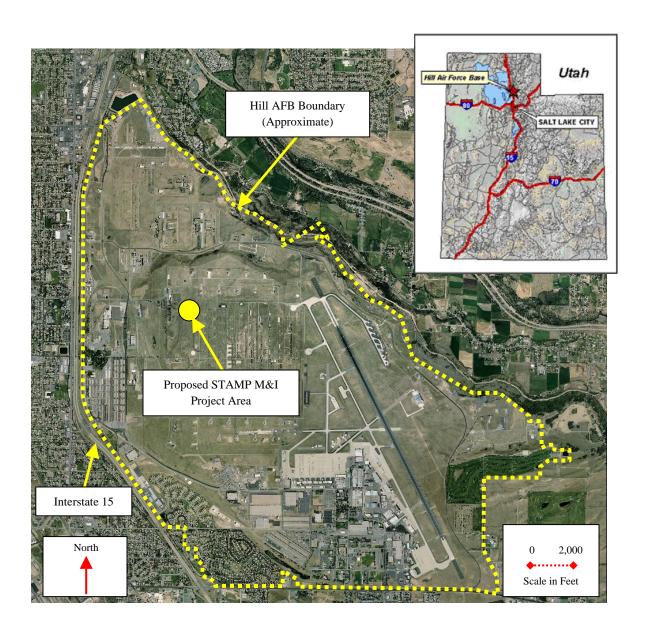


Figure 1: Location of the Proposed Action on Hill AFB



Figure 2: Proposed STAMP M&I Facility Location

1.4 Alternative Selection Criteria

Due to the considerations presented in the preceding sections, the following selection criteria were established. The facility that provides STAMP M&I capabilities on Hill AFB described in this document should:

- provide a large enclosed area (40,000 square feet) for assembly of munitions pallets and performing inspections using work bays large enough for drive-through capability;
- accommodate both current and projected new weapon workloads;
- have 2.5 acres (approximate value) of adjacent land suitable for a munitions staging area, an adjacent enclosed wash rack, a parking lot, and an access road;
- be located within the Hill AFB munitions storage area; and
- be protective of facilities, human health, and the environment.

1.5 Relevant Plans, EISs, EAs, Laws, Regulations, and Other Documents

During the scoping process, no relevant plans, environmental impact statements (EISs), or environmental assessments (EAs) were identified.

The following federal, state, and local laws and regulations would apply to the proposed action:

- The National Environmental Policy Act (NEPA), Title 42 of the United States Code (USC) Section 4321 *et seq*.
- Council on Environmental Quality regulations, Title 40 of the Code of Federal Regulations (CFR) Parts 1500-1508.
- USAF-specific requirements contained in 32 CFR Part 989, Environmental Impact Analysis Process (EIAP).
- Safety guidelines of the Occupational Safety and Health Administration (OSHA).
- Relevant Air Force Occupational Safety and Health (AFOSH) standards.
- Utah's fugitive emissions and fugitive dust rules (Utah Administrative Code [UAC] Section R307-309).
- Utah's State Implementation Plan (UAC Section R307-110), which complies with the General Conformity Rule of the Clean Air Act (CAA), Section 176 (c).
- Determining Conformity of Federal Actions to State or Federal Implementation Plans, 40 CFR Part 93.154.
- US Air Force Conformity Guide, 1995.
- Utah Asbestos Rules, UAC, Section R307-801.
- The Resource Conservation and Recovery Act (RCRA), 42 USC Chapter 82, and regulations promulgated thereunder, 40 CFR Part 260 *et seq*.
- Federal facility agreement dated April 10, 1991 under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 USC Section 9601 *et seq*.
- Utah hazardous waste management regulations contained in UAC Section R315, and the Hill AFB *Hazardous Waste Management Plan* dated May, 2001, and subsequent versions.
- The Clean Water Act (CWA), 33 USC Section 1251 et seq.
- The Energy Independence and Security Act (EISA) of 2007, Sec. 438, Storm Water Runoff Requirements for Federal Development Projects, *et seq*.

- The Hill AFB *Stormwater Management Plan Municipal Stormwater Permit*, dated April, 2007, and subsequent versions.
- Migratory Bird Treaty Act (MBTA), 16 USC Sections 703-712 et seq.
- The Hill AFB *Integrated Natural Resources Management Plan*, dated August, 2007, and subsequent versions.
- The Hill AFB *Integrated Cultural Resources Management Plan*, dated January, 2007, and subsequent versions.
- The National Historic Preservation Act (NHPA), 16 USC Section 470 et seq.

During the scoping process, no other documents were identified as being relevant to the proposed action.

1.6 Decisions That Must Be Made

Hill AFB must decide whether to:

- not provide a STAMP M&I facility (no action), or
- construct a STAMP M&I facility.
- If the decision is to provide a STAMP M&I facility, then a decision must be made as to where the facility will be located.

Renovating and expanding the existing facilities was considered and eliminated by the Hill AFB planners and engineers. Because the estimated cost for this alternative exceeded 70 percent of the real property value of the existing facilities, pursuing this alternative would have violated current USAF real property policies.

If Hill AFB decides to construct a STAMP M&I facility, the proponent and environmental managers would then decide what mitigation and/or monitoring measures, if any, should be implemented.

If Hill AFB decides to construct a STAMP M&I facility, the base would then decide if the selected alternative would or would not be a major federal action significantly affecting the quality of the human environment. If judged as not significantly affecting the quality of the human environment, then a finding of no significant impact (FONSI) would be prepared and signed, and the project would proceed. If judged as significantly affecting the quality of the human environment, then an EIS and a record of decision (ROD) would have to be prepared and signed before the project could proceed.

1.7 Scope of this Environmental Analysis

The scope of the current environmental analysis is to explore environmental issues related to the proposed action (construct a STAMP M&I facility) and the reasonable alternatives identified within this document.

1.7.1 History of the Planning and Scoping Process

Scoping discussions were held: to identify potential environmental concerns; to facilitate an efficient environmental analysis process; to identify issues and alternatives that would be considered in detail while devoting less attention and time to less important issues; and to save time in the overall process by helping to ensure that draft documents would adequately address relevant issues, thereby reducing the time required to proceed to a final document.

On January 14, 2009, an initial scoping meeting was conducted in Building 5, Hill AFB. Attendees included proponents of the proposed action, managers of Hill AFB's NEPA program, other environmental program managers, and the authors of this document.

During this meeting and subsequent scoping interaction, the following environmental issues were addressed:

- air quality,
- solid and hazardous wastes (including liquid waste streams),
- biological resources,
- geology and surface soils,
- water quality,
- cultural resources,
- occupational safety and health,
- air installation compatible use zone (AICUZ), and
- socioeconomic resources.

1.7.2 Issues Studied in Detail

The issues that have been identified for detailed consideration and are therefore presented in Sections 3 and 4 are:

Air Quality (attainment status, emissions, Utah's state implementation plan [SIP])

Air emissions would be produced by construction equipment. Operating the proposed action would create air emissions. Air quality effects are discussed in Section 4 of this document.

• Solid and Hazardous Wastes (materials to be used, stored, recycled, or disposed, including liquid waste streams; existing asbestos, lead-based paint, mercury, and polychlorinated biphenyls [PCBs])

During construction, solid wastes would be generated, and other hazardous wastes might be generated that would require proper treatment and/or disposal. Additional hazardous wastes could be generated if a spill of fuel, lubricants, or construction-related chemicals were to occur.

Operating the proposed action would be expected to create solid and hazardous wastes (to include solid and liquid wastes). Effects related to solid and hazardous wastes are discussed in Section 4 of this document.

• **Biological Resources** (flora and fauna including threatened, endangered, sensitive species; wetlands; floodplains)

Approximately 2.5 acres of undeveloped land would be disturbed by the proposed action. Effects related to biological resources are discussed in Section 4 of this document.

• Water Quality (surface water, groundwater, water quantity, wellhead protection zones)

Based on Hill AFB estimates, the land area to be disturbed would be approximately 2.5 acres in size. The proposed action would be subject to stormwater permit requirements both during the construction period and during operations.

Contamination of groundwater is not known to exist within 4,000 feet of the proposed action. Depth to groundwater is approximately 20 to 30 feet below the ground surface (bgs) in the vicinity of the proposed action. Since the proposed action would not require excavations deeper than 10 feet bgs, groundwater effects were not addressed in detail.

The scoping discussions did not identify any issues related to quantity of water or wellhead protection zones.

Effects related to water quality are discussed in Section 4 of this document.

Liquid waste streams created during construction and from operating the proposed action are included in the discussions related to solid and hazardous wastes (Section 4 of this document).

1.7.3 Issues Eliminated From Further Study

The issues that were not carried forward for detailed consideration in Sections 3 and 4 are:

• **Geology and Surface Soils** (seismicity, topography, minerals, geothermal resources, land disturbance, known pre-existing contamination)

The scoping discussions did not identify any issues related to seismicity, topography, minerals, or geothermal resources.

Excavations would be necessary to install: footings; foundations; and buried utilities consisting of water, electricity, telephone/data, natural gas, steam lines, sanitary sewer, and storm drains. Discussions related to preventing soil erosion (stormwater pollution prevention) are addressed under water quality effects (Section 4 of this document).

Contamination of shallow soil is not known to exist in the vicinity of the proposed action. Potential discovery of suspicious soils during excavation is addressed under solid and hazardous wastes (Section 4 of this document).

• Cultural Resources (archaeological, architectural, traditional cultural properties)

No significant cultural resources have been identified in the area of potential effect (APE) for the proposed action. Three previous inventories for archaeological resources were conducted on Hill AFB in 1991, 1995, and 2001, compromising 840 acres total. This has resulted in the survey of 12.5 percent of the total area of Hill AFB. Results from these projects included the recordation of one historic refuse dump and two prehistoric isolates, all determined ineligible for listing in the National Register of Historic Places (NRHP). None of the previous inventories included the APE of the proposed action. Given the lack of previous findings and the extensive development and disturbance of Hill AFB, the potential for historic properties is extremely low. However, if any are found during construction, ground-disturbing activities in the immediate vicinity will cease, the Hill AFB Cultural Resources Program will be notified, and unanticipated discovery of archaeological deposits procedures will be implemented with direction from the Hill AFB Cultural Resources Program in accordance with Standard Operating Procedure 5 in the Hill AFB *Integrated Cultural Resources* Management Plan (Hill 2007a). The Utah State Historic Preservation Office (SHPO) concurred with a finding of no adverse effect after reviewing the proposed action (Appendix A). Hill AFB has determined formal consultation with American Indian Tribes is not warranted given the absence of resources that may be reasonably construed as being of interest to them.

• Occupational Safety and Health (physical and chemical hazards, radiation, explosives, bird and wildlife hazards to aircraft)

Throughout the construction phase of the project, Hill AFB contractors would follow OSHA safety guidelines as presented in the CFR. Hazardous materials that could be used during construction are included in the discussions related to solid and hazardous wastes (Section 4 of this document).

Related to Hill AFB military personnel and civilian employees, the Bioenvironmental Engineering Flight (75 AMDS/SGPB) is responsible for implementing AFOSH standards. The AFOSH program addresses (partial list): hazard abatement, hazard communication, training, personal protective equipment and other controls to ensure that occupational exposures to hazardous agents do not adversely affect health and safety, and acquisition of new systems.

The scoping discussions did not identify any issues related to occupational safety and health that would not be routinely addressed by OSHA rules and/or the Bioengineering Flight.

• **AICUZ** (noise, accident potential, airfield encroachment)

The proposed action would be outside (less than) the 70 A-weighted decibel (dBA) noise level zone (documented in the current version of the Hill AFB AICUZ report).

So that bird air strike hazard (BASH) is not increased, the proposed facility should be designed and runoff drained in such a manner that birds would not be attracted to the site. The runoff issue is addressed under stormwater management in Section 4.2.4.2. The scoping discussions did not identify any other issues related to aircraft accident potential or airfield encroachment.

 Socioeconomic Resources (local fiscal effects including employment, population projections, and schools)

Opportunities would exist for local construction workers if the proposed action is constructed. The proposed action is not expected to create additional permanent jobs at Hill AFB. The scoping discussions did not identify any issues related to population projections or schools.

1.8 Applicable Permits, Licenses, and Other Coordination Requirements

Obtaining, modifying, and/or complying with the following permits would be required to implement the proposed action.

- The Hill AFB Title V Operating Permit (Permit Number: 1100007001, and subsequent versions).
- Industrial pretreatment permit number 110 issued by the North Davis Sewer District (NDSD), dated November 1, 2007, and subsequent versions.

- General Multi-Sector Permit for Storm Water Discharges Associated with Industrial
 Activity permit number UTR000444, which expired December 2007 (but will be valid
 until a new permit is issued, the application for which has been submitted), and
 subsequent versions.
- Requirements specified in Utah's Storm Water General Permit for Construction Activities.
- The Hill AFB *Stormwater Management Plan Municipal Stormwater Permit*, dated April, 2007, and subsequent versions.
- Utah Pollutant Discharge Elimination System (UPDES) General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), permit number UTR090028, which expired December 2007 (but will be valid until a new permit is issued, the application for which has been submitted), and subsequent versions.

The proponents would coordinate with the Hill AFB hazardous materials program manager (75 CEG/CEVC) to discuss hazardous materials brought on base to construct the proposed action.

2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION

2.1 Introduction

This section discusses the process used to develop the alternatives, describes the alternatives, and compares (in a brief summary fashion) the alternatives and their expected effects. Finally, this section states the Air Force's preferred alternative.

2.2 Process Used to Develop the Alternatives

As discussed in Sections 1.3 and 1.4 of this document, Hill AFB intends to provide a STAMP M&I facility. The proposed facility described in this document would comply with all relevant design standards and would have sufficient space to accommodate all 649 MUNS program needs.

Hill AFB planners and engineers investigated expanding the existing facilities (see Section 2.3.3.1), and other potential locations for siting the proposed STAMP M&I facility (see Section 2.3.3.2).

2.3 Description of Alternatives

2.3.1 Alternative A: No Action

Under the no action alternative, the STAMP M&I facility would not be constructed, and severe space and work flow limitations would continue to exist.

2.3.2 Alternative B: Proposed Action - Construct a STAMP M&I Facility

The proposed action is to construct a STAMP M&I facility within the Hill AFB munitions storage area (Figures 1 and 2). The proposed action would consist of:

- Constructing a single story 40,000 square foot steel frame structure with a concrete slab, masonry exterior walls, and a standing seam metal roof. Interior spaces would consist of four M&I bays, one large STAMP assembly bay, offices, restroom and shower areas, a break/conference room, a mechanical equipment room, and storage areas.
- Providing two oil-water separators inside the structure.
- Supplying an outdoor munitions staging area (40,000 square feet), a parking lot (10,000 square feet), and an access road (20,000 square feet).
- Constructing an adjacent enclosed wash rack for pressure washing munitions trailers.
- Routing power via three power poles for overhead lines and buried cable to the facility.
- Providing a generator for emergency backup power.

- Installing a six-inch diameter buried steam line and a three-inch diameter buried condensate line.
- Providing connections to remaining buried utilities consisting of water, telephone/data, sanitary sewer, and storm drains.
- Potentially rerouting two existing water lines that currently cross the eastern edge of the proposed 2.5-acre site.

2.3.3 Alternatives Eliminated From Detailed Study

2.3.3.1 Renovating and Expanding

Renovating and expanding the existing facilities was considered and eliminated by the Hill AFB planners and engineers. Because the estimated cost for this alternative exceeded 70 percent of the real property value of the existing facilities, pursuing this alternative would have violated current USAF real property policies.

2.3.3.2 Other Locations

The Hill AFB explosive safety office attempted to identify alternative locations for the 649 MUNS STAMP M&I facility.

The munitions and missile storage (MAMS) areas are the only locations on Hill AFB where storage of munitions is permitted. The undeveloped areas within MAMS I and MAMS II are fairly uniform in their environmental characteristics, which means evaluating any area within MAMS I or MAMS II would be expected to yield similar results. More important, however, is the consideration that site selection for the proposed action was based on explosive safety requirements identified in Department of Defense (DOD) Directive 6055.9-StD, DOD Ammunition and Explosive safety standards.

The proposed location in MAMS I was selected to provide maximum possible protection to personnel and property, both inside and outside Hill AFB, from the damaging effects of potential accidents involving ammunition and explosives. The Hill AFB explosive safety office applied a management information system (Assessment System for Hazard Surveys) to determine the best location for the proposed action, based on explosive quantity-distance(QD) separation criteria as identified in Air Force Manual 91-201, Explosive Safety Standards, Chapter 12. The QD separation calculations are driven by net explosive weight (NEW) of munitions predicted to be present in the facility. The proposed location represents the only area in MAMS with sufficient space to construct approach aprons and turn-around pavements allowing large flatbed trucks to drive into the STAMP M&I assembly warehouse portion of the facility, to be subsequently loaded with pallets, drive out the other side, and exit the facility.

2.4 Summary Comparison of Alternatives and Predicted Achievement of Project Objectives

2.4.1 Summary Comparison of Alternatives

The no action alternative would be to continue current operations using the existing STAMP M&I facility. Current operations would remain severely challenged, and projected new weapon workloads could not be accommodated.

Under Alternative B (proposed action) a STAMP M&I facility would be constructed, enabling Hill AFB to accommodate current and projected new weapon workloads.

2.4.2 Summary Comparison of Predicted Achievement of Project Objectives

Description of the	Alternative A	Alternative B	
Project Objective	(No Action)	(Proposed Action)	
Provide a large enclosed area (40,000 square feet)			
for assembly of munitions pallets and performing	No	Yes	
inspections using work bays large enough for drive-	NO	ies	
through capability			
Accommodate both current and projected new	No	Yes	
weapon workloads	NO	168	
Have 2.5 acres (approximate value) of adjacent land			
suitable for a munitions staging area, an adjacent	No	Yes	
enclosed wash rack, a parking lot, and an access road			
Be located within the Hill AFB munitions storage	Yes	Yes	
area	1 es	res	
Be protective of facilities, human health, and the	Yes	Yes	
environment	ies	ies	

Table 1: Summary Comparison of Predicted Achievement of Project Objectives

2.5 Identification of the Preferred Alternative

Hill AFB prefers Alternative B (the proposed action).

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

Section 3 of this document discusses the existing conditions of the potentially affected environment, establishing a resource baseline against which the effects of the various alternatives can be evaluated. It presents relevant facilities and operations, environmental issues, pre-existing environmental factors, and existing cumulative effects due to human activities in the vicinity of the proposed action or the alternative locations.

Issues discussed during scoping meetings, but eliminated from detailed consideration (see Section 1.7.3) include:

- geology and surface soils (seismicity, topography, minerals, geothermal resources, land disturbance, known pre-existing contamination);
- cultural resources (archaeological, architectural, traditional cultural properties);
- occupational safety and health (physical and chemical hazards, radiation, explosives, bird and wildlife hazards to aircraft);
- AICUZ (noise, accident potential, airfield encroachment); and
- socioeconomic resources (local fiscal effects including employment, population projections, and schools).

3.2 Description of Relevant Facilities and Operations

The existing facility is unsuitable for current workloads and cannot accommodate projected new weapon workloads. No other relevant facilities or operations were identified.

3.3 Description of Relevant Affected Issues

3.3.1 Air Quality

Hill AFB is located in Davis and Weber Counties, Utah. Neither county is in complete attainment status with federal clean air standards (Figures 3 and 4). Non-attainment areas fail to meet national ambient air quality standards (NAAQS) for one or more of the criteria pollutants: oxides of nitrogen (NOx), sulfur dioxide (SO₂), ozone (O₃), particulates less than 10 microns in diameter (PM-10), particulates less than 2.5 microns in diameter (PM-2.5), carbon monoxide (CO), and lead. Davis County (the county in which the proposed action lies) is currently awaiting non-attainment designations for ozone and for PM-2.5. Due to the ozone designation, emission offsets are required for new sources emitting NOx and volatile organic compounds (VOCs), which are precursors to ozone formation. Due to the PM-2.5 designation, Utah's Division of Air Quality (DAQ) must submit an implementation plan to the United States Environmental Protection Agency (EPA) for reducing concentrations of the five main types of

pollutants contributing to fine particle concentrations in the non-attainment areas (the pollutants are direct PM-2.5 emissions, SO₂, NOx, ammonia, and VOCs).

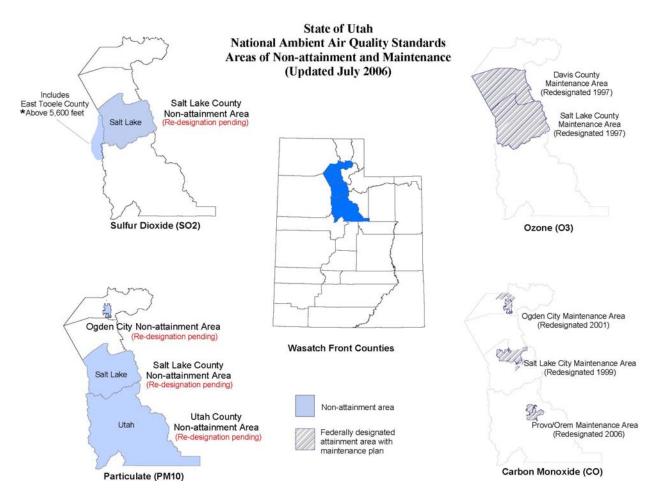


Figure 3: State of Utah National Ambient Air Quality Standards, Areas of Non-Attainment and Maintenance

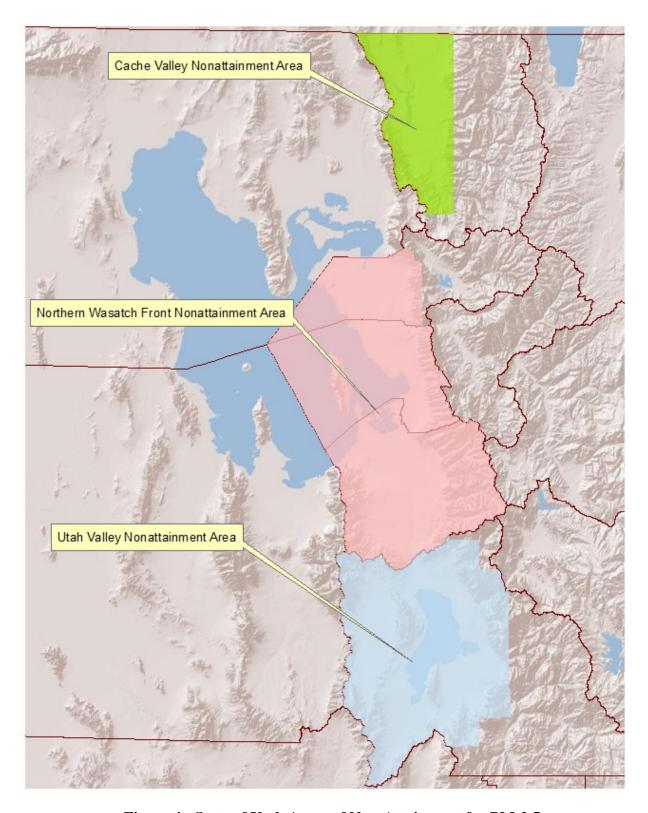


Figure 4: State of Utah Areas of Non-Attainment for PM-2.5

The current air quality trend at Hill AFB is one of controlling emissions as Hill AFB managers implement programs to eliminate ozone-depleting substances, limit use of VOCs, switch to lower

vapor pressure solvents and aircraft fuel, convert internal combustion engines from gasoline and diesel to natural gas, and improve the capture of particulates during painting and abrasive blasting operations (in compliance with the base's Title V air quality permit).

Published emission estimates are available for criteria air pollutants and hazardous air pollutants (HAPs) for Hill AFB (Hill 2009), and criteria air pollutants for Davis and Weber Counties (DAQ 2009b). The estimates, shown below in Table 2 were based on data from calendar year 2007 for Hill AFB, and for calendar year 2005 for Davis and Weber Counties.

Location	VOC	CO	NOx	PM-10	HAP	SOx
Hill AFB	278	225	244	41	41	7
Davis County	16,958	63,439	10,720	3,641	not reported	3,480
Weber County	14,796	47,956	6,868	2,882	not reported	238

Table 2: Baseline Criteria Pollutants and HAPs (tons/year)

3.3.2 Solid and Hazardous Wastes

In general, hazardous wastes include substances that, because of their concentration, physical, chemical, or other characteristics, may present substantial danger to public health or welfare or to the environment when released into the environment or otherwise improperly managed. Potentially hazardous and hazardous wastes generated at Hill AFB are managed as specified in the *Hill AFB Hazardous Waste Management Plan* with oversight by personnel from the Environmental Management Division and the Defense Reutilization and Marketing Office (DRMO). Hazardous wastes at Hill AFB are properly stored during characterization, and then manifested and transported off site for treatment and/or disposal.

Wastes created within the existing STAMP M&I facility are limited to uncontaminated office trash and domestic sewage. The STAMP M&I facility is connected to a sanitary sewer that flows to a sewage treatment plant operated by NDSD.

3.3.3 Biological Resources

No federal or state endangered or threatened species are known to occur on Hill AFB (Hill 2007b) and no likely habitat for any such species would be disturbed by the proposed action. Wildlife species that are federally listed, candidates for federal listing, or for which a conservation agreement is in place automatically qualify for the Utah sensitive species list. The additional species on the Utah sensitive species list, "wildlife species of concern," are those species for which there is credible scientific evidence to substantiate a threat to continued population viability. Two species on Utah's species of concern (SOC) list have been sighted on Hill AFB, the Long Billed Curlew and the Bobolink. Those sighting were unusual for these species and occurred during the fall migration. These species have not been observed in the vicinity of the proposed action. There are no wetlands or floodplains in the vicinity of the

alternatives discussed in this document. The alternatives discussed in this document are located in or near developed areas on Hill AFB.

The habitat within this 2.5-acre area is classified as semi-improved (Hill AFB habitat descriptions [Hill 2007b]). This habitat is characterized by open fields of grass and forbs that are periodically mowed. Periodic maintenance is performed primarily for reasons such as erosion and dust control, bird control, and visual clear zones. This land use classification can include areas adjacent to runways, taxiways, and aprons; runway clear zones; lateral safety zones; rifle and pistol ranges; weapons firing and bombing ranges; picnic areas; ammunition storage areas; antenna facilities; and golf course roughs.

Semi-improved areas are not irrigated, and the plant species that grow in these communities survive on natural precipitation. Typically, there is little to no over story and only a small number of wild trees exist. Mowing prevents new trees from establishing. The soil is coarse grained, with most moisture evaporating or percolating beneath the root zone. Plants growing in this habitat have adapted to sparse soil moisture and can withstand periods of drought as well as cold snowy conditions. The grassy areas provide food and cover for a limited number of wildlife species. Many of the grasses and forbs are invasive (Table 3). Insects living in this habitat provide food for a small diversity of birds. There are no urban forest trees in the 2.5 acres comprising the proposed action.

Common name	Scientific name
Storksbill	Erodium cicutarium
Cheat Grass	Bromus tectorum
Dandelion	Taraxacum officinale
Kochia	Kochia scoparia

Table 3: Invasive Species Currently Present

The natural resources program at Hill AFB has created models to measure components that indicate the health of the habitat at specific locations. The components that are measured include: the health of a range (range health index, or RHI), the ability of a habitat to support wildlife (wildlife community index, or WCI), and the encroachment of invasive species (floristic quality index, or FQI). Site surveys quantify the health of a range by producing calculated indices ranging from 0.01 to 1.00 with 1.00 being the optimal level at which a habitat can function. For the RHI scale, 0.80 and higher is considered pristine, and below 0.30 is considered highly degraded. The RHI for the 2.5-acre site is 0.6, the WCI is 0.16, and the FQI is 0.47.

Several species of small mammals occupy the semi-improved habitats on Hill AFB. Various species of birds have been observed using the Hill AFB urban forest areas in the general vicinity of the proposed action (see Table 4).

Common Name	Scientific Name
American Kestral	Falco sparverius
American Robin	Turdus migratorius
Barn Swallow	Hirundo rustica
Black-billed Magpie	Pica hudsonia

Black-capped chickadee	Poecile atricapilla
Brewer's Blackbird	Euphagus cyanocephalus
Bullock's Oriole	Icterus bullockii
Common Raven	Corvus corax
Dark-eyed Junco	Junco hyemalis
European Starling	Sturnus vulgaris
House Finch	Carpodacus mexicanus
House Sparrow	Passer domesticus
Meadowlark	Sturnella neglecta
Morning Dove	Zenaida macroura
Northern Flicker	Colaptes auratus
Rock Pigeon	Columba livia
White-crowned Sparrow	Zonotrichia leucophrys
various hummingbirds	

Table 4: Birds That Could Occupy Trees of Hill AFB Urban Forest

3.3.4 Water Quality

In areas of Hill AFB that are not heavily developed, runoff is allowed to infiltrate into the ground through overland flow or surface ditches, discharging to large unoccupied areas. In developed areas, stormwater is conveyed to 15 retention or detention ponds within Hill AFB boundaries. Stormwater from retention ponds percolates and evaporates, resulting in zero discharge. Detention ponds are checked for presence of an oil sheen prior to discharging stormwater by manually opening the outfall valves.

No surface water bodies are present within the area occupied by the facility or the area proposed for constructing the new STAMP M&I facility. Based on a review of the *Hill AFB Stormwater Management Plan - Municipal Stormwater Permit* (Stantec 2007), no storm drains exist in this area of MAMS. Precipitation either evaporates or infiltrates into on-site soils.

3.4 Description of Relevant Pre-Existing Environmental Factors

The Wasatch Front Regional Council (WFRC 2003) assessed earthquake hazards for Davis County, Utah, including the portion of Hill AFB that includes the alternatives discussed in this document. The Davis County liquefaction potential map shows this area of Hill AFB to be in the zone labeled as very low risk. The Davis County earthquake hazard map shows this area of Hill AFB to be outside of known fault zones. The Davis County landslide hazard map shows this area of Hill AFB to be outside of known landslide risk zones.

During scoping discussions and subsequent analysis, no other pre-existing environmental factors (e.g., hurricanes, tornados, floods, droughts) were identified for the proposed action.

3.5 Description of Areas Related to Cumulative Effects

For air quality, the area related to cumulative effects would include Hill AFB, Davis County, and Weber County.

For solid and hazardous wastes, the area related to cumulative effects would include Hill AFB.

For biological resources, the area related to cumulative effects would include Hill AFB.

For water quality, the area related to cumulative effects would include Hill AFB and waters downstream from the Hill AFB stormwater retention ponds.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

This section discusses effects to the resources that were identified for detailed analysis in Section 1.7.2, and for which existing conditions were presented in Section 3.3. For each of these resources, the following analyses are presented:

- direct, indirect, and cumulative effects of the no action alternative; and
- direct, indirect, and cumulative effects of the proposed action (Alternative B).

4.2 Predicted Effects to Relevant Affected Resources of All Alternatives

4.2.1 Predicted Effects to Air Quality

4.2.1.1 Alternative A: No Action

The no action alternative would have no direct effects, no indirect effects, and no cumulative effects.

4.2.1.2 Alternative B (Proposed Action): Construct a STAMP M&I Facility

Direct Effects Due to Construction

- **Fugitive Dust**: Fugitive emissions from construction activities would be controlled according to UAC Section R307-205, *Emission Standards: Fugitive Emissions and Fugitive Dust* and the Hill AFB *Fugitive Dust Plan*. Good housekeeping practices would be used to maintain construction opacity at less than 20 percent. Haul roads would be kept wet. Any soil that is deposited on nearby paved roads by construction vehicles would be removed from the roads and either returned to the site or placed in an appropriate on-base disposal facility.
- **Heavy Equipment**: The internal combustion engines of heavy equipment would generate emissions of VOCs, CO, NOx, PM-10, PM-2.5, HAPs and oxides of sulfur (SOx). Assumptions and estimated emissions for the construction period are listed in Table 5.

Data Assumptions										
		Diesel Emission Factor (lbs/hr)								
Equipment Type	VOC (HC)	CO	NOx	PM10	HAPs	SOx				
Asphalt Paver	0.28	1.24	2.96	0.24	0.05	0.25				
Bobcat Loader	0.14	0.67	1.00	0.10	0.01	0.08				
Cable Plow	0.59	3.75	4.49	0.59	0.08	0.38				
Compressor (boring)	0.25	1.62	1.94	0.25	0.04	0.16				
Concrete Truck	0.80	3.55	8.50	0.69	0.15	0.72				
Crane	2.14	6.96	17.08	2.39	0.33	1.54				
Dump Truck	0.63	2.04	6.98	0.58	0.16	0.65				
Flat Bed Truck	0.48	1.54	5.29	0.44	0.12	0.49				
Fork Lift	0.42	2.47	1.98	0.40	0.05	0.23				
Generator	0.02	0.10	0.12	0.02	0.00	0.01				
Loader/Backhoe	0.87	4.12	6.12	0.64	0.06	0.52				
Motored Grader	0.83	2.01	5.08	0.53	0.06	0.46				
Scraper	0.33	2.31	4.03	0.58	0.13	0.42				
Track Hoe	0.91	6.65	13.75	1.84	0.26	1.19				
Vibratory Compactor	0.38	1.44	4.31	0.36	0.09	0.46				
Water Truck	1.10	3.58	12.28	1.02	0.28	1.14				
Wheeled Dozer	0.46	1.48	5.08	0.35	0.08	0.49				
Note: VOCs = Hydrocarbons and HAPs =										

Note: VOCs = Hydrocarbons and HAPs = Aldehydes Source: Industry Horsepower Ratings and EPA 460/3-91-02

Construct STAMP M&I Facility

Construct STAMP M&I Facility									
EQUIPMENT	HOURS OF	Diesel Emissions (lbs)							
TYPE	OPERATION	VOC	CO	NOx	PM10	HAPs	SOx		
Asphalt Paver	120	33.6	148.8	355.2	28.8	6.0	30.0		
Bobcat Loader	12	1.7	8.0	12.0	1.2	0.1	1.0		
Cable Plow	8	4.7	30.0	35.9	4.7	0.6	3.0		
Compressor (boring)	0	0.0	0.0	0.0	0.0	0.0	0.0		
Concrete Truck	16	12.8	56.8	136.0	11.0	2.4	11.5		
Crane	36	77.0	250.6	614.9	86.0	11.9	55.4		
Dump Truck	30	18.9	61.2	209.4	17.4	4.8	19.5		
Flat Bed Truck	12	5.8	18.5	63.5	5.3	1.4	5.9		
Fork Lift	12	5.0	29.6	23.8	4.8	0.6	2.8		
Generator	24	0.5	2.4	2.9	0.5	0.0	0.2		
Loader/Backhoe	36	31.3	148.3	220.3	23.0	2.2	18.7		
Motored Grader	36	29.9	72.4	182.9	19.1	2.2	16.6		
Scraper	12	4.0	27.7	48.4	7.0	1.6	5.0		
Track Hoe	24	21.8	159.6	330.0	44.2	6.2	28.6		
Vibratory Compactor	8	3.0	11.5	34.5	2.9	0.7	3.7		
Water Truck	24	26.4	85.9	294.7	24.5	6.7	27.4		
Wheeled Dozer	24	11.0	35.5	121.9	8.4	1.9	11.8		
TOTAL ESTIMATED EMISSIONS (lbs)		287.5	1146.9	2686.2	288.8	49.4	241.0		
TOTAL ESTIMATED EMISSIONS (tons)	·	0.14	0.57	1.34	0.14	0.02	0.12		

Source of Hours: Steve Weed, Hill AFB Engineering

Table 5: Calculated Heavy Equipment Emissions

Direct Effects Due to Operations

Based on information received during the scoping meeting held on January 14, 2009 and subsequent discussions with the proponent, the only air emissions due to operating the proposed action would be related to using approximately 500 16-ounce cans of low VOC spray paint each year to mark wooden pallets (62.5 gallons of paint). A typical material safety data sheet for low VOC paint states a VOC content of 48 percent and a product weight of 7.12 pounds per gallon. The resulting VOC emissions would be calculated as 214 pounds of VOCs per year.

Indirect Effects

During scoping and the detailed analysis, no indirect effects related to air quality were identified for the proposed action.

Cumulative Effects

- *Construction*: Construction-related air emissions would be limited to a duration of several months. Comparing the magnitude of predicted construction-related air emissions (Table 5) to existing emissions for Hill AFB, Davis and Weber Counties (Table 2), there would not be significant cumulative effects to air quality associated with constructing the proposed action.
- *Operations*: Hill AFB air quality managers would ensure that long-term operation of the proposed action complies with the Hill AFB Title V Permit, any relevant approval orders, United States Environmental Protection Agency (EPA) regulations, and the Utah SIP. Any required air quality control devices would be installed and tested prior to allowing newly installed equipment to begin operating. Comparing the magnitude of predicted operational air emissions to existing emissions in Hill AFB, Davis and Weber Counties (Table 2), no significant cumulative effects to air quality were identified for operating the proposed action.

4.2.2 Predicted Effects to Solid and Hazardous Waste

4.2.2.1 Alternative A: No Action

With respect to solid and hazardous waste, the no action alternative would have no direct effects, no indirect effects, and no cumulative effects.

4.2.2.2 Alternative B (Proposed Action): Construct a STAMP M&I Facility

Direct Effects Due to Construction

- Waste Generation: During the proposed construction activities, solid wastes expected to be generated would be construction debris consisting mainly of concrete, metal, and building materials. These items would be treated as uncontaminated trash and recycled when feasible. It is possible that equipment failure or a spill of fuel, lubricants, or construction-related chemicals could generate solid or hazardous wastes. In the event of a spill of regulated materials, Hill AFB environmental managers and their contractors would comply with all federal, state, and local spill reporting and cleanup requirements.
- Waste Management: Hill AFB personnel have specified procedures for handling construction-related solid and hazardous wastes in their engineering construction specifications. The procedures are stated in Section 01000, General Requirements, Part 1, General, Section 1.24, Environmental Protection. All solid non-hazardous waste is collected and disposed or recycled on a routine basis. Samples from suspect wastes are analyzed for hazardous vs. non-hazardous determination. The suspect waste is safely

stored while analytical results are pending. Hazardous wastes are stored at sites operated in accordance with the requirements of 40 CFR 265. The regulations require the generator to characterize hazardous wastes with analyses or process knowledge. Hazardous wastes are eventually labeled, transported, treated, and disposed in accordance with federal and state regulations.

• Excavated Soils: There is no known soil contamination at the location of the proposed action. However, excavations near areas of industrial activity on Hill AFB could potentially encounter contaminated soil. If unusual odors or soil discoloration were to be observed during any excavation or trenching necessary to complete the proposed action, the soil would be stored on plastic sheeting and the remedial manager from the Hill AFB Environmental Restoration Branch (75 CEG/CEVR) would be notified (Ms. Shannon Smith at 801-775-6913). Any excess clean soil would either be used as fill for another on-base project or placed in the on-base landfill. Any soil determined to be hazardous would be eventually labeled, transported, treated, and disposed in accordance with federal and state regulations. No soil would be taken off base without prior 75 CEG/CEVR written approval.

Direct Effects Due to Operations

Based on information received during the scoping meeting held on January 14, 2009, two issues related to solid and hazardous waste were identified for operating the proposed action.

- *Non-Regulated Solid Waste*: Uncontaminated office trash would be generated. Small quantities of wood from unusable pallets, cardboard, and steel banding would be generated. Unless recycled, these non-regulated items would be disposed as uncontaminated trash. Recycling opportunities are likely to exist for aluminum, steel, paper, cardboard, and plastic items.
- Regulated Liquid Waste: Domestic sewage from a break room, bathroom, and shower would flow to a sewage treatment plant operated by NDSD. Two oil-water separators would provide pretreatment for liquid effluent from the STAMP M&I facility. A hot water pressure washer would be employed at the adjacent wash rack to clean pallets and the top surfaces of trailers. No detergents would be used, and no oil or grease would be expected to enter the effluent. At the wash rack, a catch basin or grit chamber would separate settleable solids from liquid effluent.

Indirect Effects

During scoping and the detailed analysis, no indirect effects related to solid and hazardous waste were identified for the proposed action.

Cumulative Effects

Proper handling of solid and hazardous waste eliminates releases of contaminants to the environment or reduces such releases in conformity with legal limits. There are no significant cumulative solid or hazardous waste effects associated with the proposed action.

4.2.3 Predicted Effects to Biological Resources

4.2.3.1 Alternative A: No Action

With respect to biological resources, the no action alternative would have no direct effects, no indirect effects, and no cumulative effects. The five-acre site would remain in its current, somewhat degraded, condition. Existing human activities, such as periodic mowing, would continue in the area.

4.2.3.2 Alternative B (Proposed Action): Construct a STAMP M&I Facility

Direct Effects Due to Construction

- Construction: Grading and covering the site with structures and pavements would reduce available forage for birds and displace rodents. Eliminating these grasses and forbs would not be a significant effect due to the small size of the proposed project and the low quality of existing forage (WCI of 0.16). Recent site observations confirmed the presence of invasive species listed in Table 3. Without mitigation, construction activities would increase the chance of introducing additional invasive species.
- *Mitigation*: If construction should occur during nesting season (usually April through August), a bird survey would be conducted, and an appropriate certificate of registration would be obtained to permit the taking of any protected species nesting in the trees along the western boundary of the proposed project area. Mitigation for loss of habitat would be accomplished by providing a functional lift to the habitat. This would be accomplished by restoration planting (of any areas not occupied by structures or pavements) that would include fire resistant plants, native grasses, and native shrubs as outlined in the Hill AFB *Integrated Natural Resources Management Plan* (Hill 2007b).

Direct Effects Due to Operations

Operating the proposed action would discourage nesting and foraging activities by birds. In addition, operations would discourage small mammals from establishing residency at the site. If stormwater is allowed to accumulate on the surface of the site, nesting and roosting of pigeons, starlings, ravens, and other nuisance birds could increase during wet periods.

Indirect Effects

Indirect effects of displaced mammals would result in increase of mammals occupying less semi-improved habitat on Hill AFB. Loss of foraging area would result in birds moving to other semi-improved habitat areas for food. Any increased nesting and roosting of pigeons, starlings, ravens, and other nuisance birds could contribute to BASH on a temporary basis during wet periods. This issue is addressed in Section 4.2.4.2.

During scoping and the detailed analysis, no other indirect effects related to biological resources were identified for the proposed action.

Cumulative Effects

Past actions at this site include removal of native sagebrush by consistent mechanical mowing of the vegetation. The habitat has been changed from a native shrub dominated community to a degraded grass and forb plant community. Constructing the proposed action would reduce available forage for birds and displace rodents. Long-term existence of the proposed facilities would prevent succession of this area to a native state. However, due to the small size of the proposed project and already degraded biological indices, no significant cumulative effects to biological resources were identified for the proposed action.

4.2.4 Predicted Effects to Water Quality

4.2.4.1 Alternative A: No Action

With respect to water quality, the no action alternative would have no direct effects, no indirect effects, and no cumulative effects.

4.2.4.2 Alternative B (Proposed Action): Construct a STAMP M&I Facility

Direct Effects Due to Construction

Based on information provided by Hill AFB engineers, the land area to be disturbed would be approximately 2.5 acres in size. The proposed action would therefore be covered under Utah's general construction permit rule for stormwater compliance. Prior to initiating any construction activities, this permit must be obtained and erosion and sediment controls must be installed according to a stormwater pollution prevention plan (SWPPP). The SWPPP would specify measures to prevent soil from leaving the construction site on the wheels of construction vehicles, thereby controlling the addition of sediments to the storm drain system. The proponents would coordinate with the Hill AFB water quality manager (75CEV/CEGOC) prior to submitting an application for a Utah construction stormwater permit.

The SWPPP and Hill AFB construction specifications would require the contractor to restore the land to a non-erosive condition. All areas disturbed by excavation would be backfilled, and then either be covered by pavements, gravel, or re-planted, re-seeded, or sodded to prevent soil erosion.

Since the proposed action would convert nearly two acres currently occupied by open land to impermeable surfaces, increased stormwater runoff volume would be expected unless runoff controls were to be created during construction of the facility. EISA Section 438 specifies storm water runoff requirements for federal development projects. The sponsor of any development or redevelopment project involving a federal facility with a footprint that exceeds 5,000 square feet must use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. Compliance with this requirement (by designing and constructing detention and/or retention structures) would eliminate downstream effects due to creating impermeable surfaces.

So that BASH is not increased, facility runoff would be handled in such a manner that increased bird activity would not be encouraged. During facility design, engineers would incorporate measures to distribute runoff such that the site would not increase in its potential to attract birds. Based on expected soil infiltration rates, likely control measures could include use of multiple swails and/or subsurface drainage structures. To further discourage bird activity, a revegetative seed mixture would be provided by the Hill AFB natural resources program manager.

Direct Effects Due to Operations

The proposed facility would be subject to Utah's general multi-sector permit rule for stormwater compliance. The *Hill AFB Stormwater Management Plan - Municipal Stormwater Permit* establishes good housekeeping measures and other best management practices to prevent contamination of runoff.

Indirect Effects

During scoping and the detailed analysis, no indirect effects related to water quality were identified for the proposed action.

Cumulative Effects

On-base and off-base water quality would be protected during and after construction activities. There are no significant cumulative water quality effects associated with the proposed action.

4.3 Summary Comparison of Predicted Environmental Effects

Issue	Alternative A No Action	Alternative B Proposed Action
Air Quality	No effects	Construction equipment would create temporary emissions. Fugitive dust emissions would be mitigated. Air emissions from cans of spray paint would be approximately 0.1 tons per year of VOCs.
Solid and Hazardous Waste	No effects	If contaminated soils are identified, they would be properly handled during the construction process. Operational activities would generate uncontaminated trash and domestic sewage. Solid and liquid wastes containing regulated substances would all be properly contained, stored, transported, disposed, re-used, and/or recycled. Wastewater would be treated by NDSD.
Biological Resources	No effects	Site habitat has been previously degraded by human activities. The proposed action would reduce available forage for birds and displace rodents. Without mitigation, construction activities would increase the chance of introducing additional invasive species. No trees would be removed. If any protected nesting birds should exist adjacent to construction activities, a certificate of registration would have to be obtained. Restoration planting (of any areas not occupied by structures, pavements, or irrigated turf) would include fire resistant plants, native grasses, and native shrubs.
Water Quality	No effects	During construction and operations, water quality would be protected by implementing stormwater management practices. Predevelopment hydrologic characteristics would be preserved. Facility runoff would be handled in such a manner that increased bird activity would not be encouraged.

Table 6: Summary Comparison of Predicted Environmental Effects

5.0 LIST OF PREPARERS

Streamline Consulting, LLC

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EMAssist, Inc.

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CH2M HILL, Inc.

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6.0 LIST OF PERSONS AND AGENCIES CONSULTED

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Russ Lawrence, Wildlife/Habitat Biologist, (801) 777-6972

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7.0 REFERENCES

CFR: *Code of Federal Regulations*, US Government Printing Office, Office of the Federal Register (various sections and dates).

DAQ 2007: "Utah's Area Designation Recommendation for the 2006 PM2.5 NAAQS", Utah Division of Air Quality, December, 2007.

DAQ 2009a: State of Utah National Ambient Air Quality Standards, Areas of Non-Attainment and Maintenance (Updated July 2006), Utah Division of Air Quality Website, February, 2009.

DAQ 2009b: *Division of Air Quality Annual Report for 2008*, Utah Division of Air Quality, January, 2009.

Economic 2008: *Utah Labor Force:* (Section 5 of the Utah Business & Economic Profile), Economic Development Corporation of Utah, January 31, 2008.

EPA 1991: *Nonroad Engine and Vehicle Emission Study - Report*, Table 2-07a, US Environmental Protection Agency, 1991.

EPA 1998: National Air Pollutant Emission Trends, Procedures Document for 1900-1996, US Environmental Protection Agency, Page 4-285, 1996.

Hill AFB: Construction Specifications, Section 01000, General Requirements, Part 1, General, Section 1.24, Environmental Protection, Hill AFB, UT, current version.

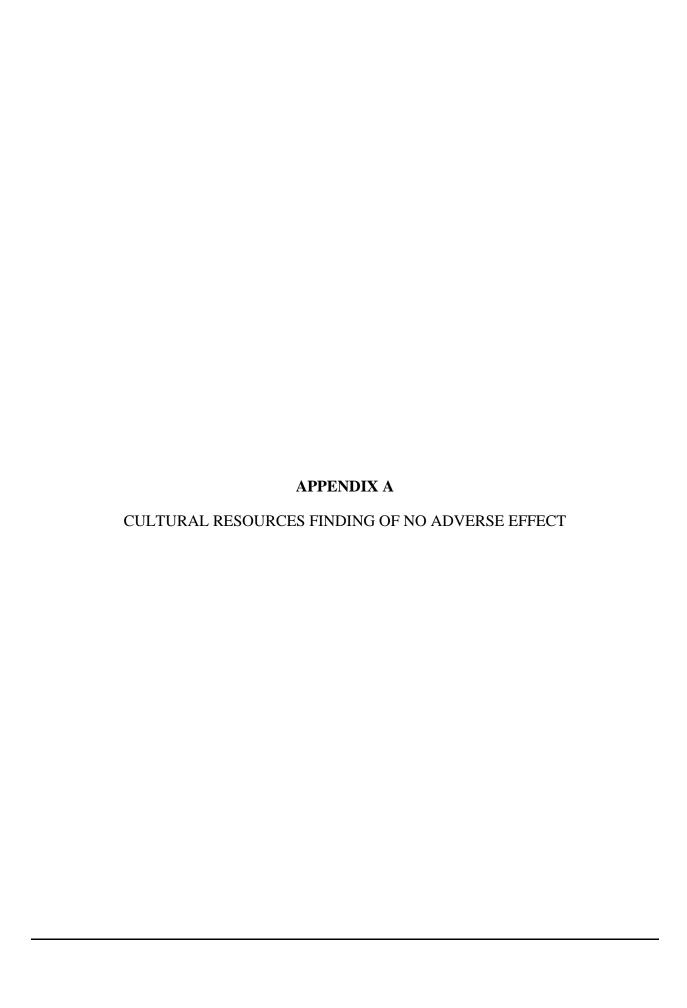
Hill 2007a: Integrated Cultural Resources Management Plan, Hill AFB, 2007.

Hill 2007b: Integrated Natural Resources Management Plan, Hill AFB, 2007.

Hill 2009: 2007 Annual Criteria and Toxic Pollutant Emission Inventory, Hill AFB, provided by CH2M HILL, February, 2009.

Stantec 2007: *Hill AFB Stormwater Management Plan - Municipal Stormwater Permit*, Stantec Consulting, April, 2007.

WFRC 2003: *Natural Hazard Pre-Disaster Mitigation Plan, Utah's Wasatch Front*, Wasatch Front Regional Council, December 2003.





State of Utah

JON M. HUNTSMAN, JR. Governor

GARY R. HERBERT Lieutenant Governor Department of Community and Culture

PALMER DePAULIS Executive Director

State History

PHILIP F. NOTARIANNI Division Director

February 19, 2009

Ms Jaynie Hirschi Archaeologist 75th CEG/CEVOR 7274 Wardleigh Road Hill Air Force Base UT 84056-5137

RE: Child Development Center and Maintenance Facility, Hill Air Force Base, Davis County, Utah

In Reply Please Refer to Case No. 09-0257

Dear Ms Hirschi:

The Utah State Historic Preservation Office received your request for our comment on the above-referenced project on February 17, 2009.

We concur with your determinations of No Historic Properties Affected.

This letter serves as our comment on the determinations you have made, within the consultation process specified in §36CFR800.4. If you have questions, please contact me at 801-533-3555 or Lhunsaker@utah.gov or Jim Dykman at 801-533-3523 or Jdykman@utah.gov

Sincerely,

Lori Hunsaker

Deputy State Historic Preservation Officer - Archaeology

OR.



DEPARTMENT OF THE AIR FORCE 75TH CIVIL ENGINEER GROUP (AFMC) HILL AIR FORCE BASE UTAH

9 February 2009

Dr. W. Robert James Chief, Environmental Management Division 75 CEG/CEV 7274 Wardleigh Road Hill Air Force Base, Utah 84056-5137

Ms. Lori Hunsaker State Historic Preservation Officer 300 Rio Grande Salt Lake City, Utah 84101

Dear Ms. Hunsaker

Hill Air Force Base (AFB) is currently proposing to build a Child Development Center (CDC) and a new maintenance facility, both located in Davis County, Utah. The combined Area of Potential Effect (APE) is 15.4 acres of property (Attachment 1, Area of Potential Effect for the Proposed Child Development Center, Hill Air Force Base, Utah and Attachment 2, Area of Potential Effect for the Proposed Maintenance Facility, Hill Air Force Base, Utah). The purpose of the CDC is to provide a high-quality and safe developmental learning environment for children located on Hill AFB. The existing facility is filled to capacity and the new CDC would allow Hill AFB to increase overall capacity and meet current and anticipated future demand. The intent of the maintenance facility is to replace the existing outdated and undersized facility, accommodate current and projected workloads, increase readiness and reduce work flow time by consolidating operations in a single facility, closer to existing storage facilities.

Within Hill AFB, three previous inventories have comprised cultural resources survey of 840 acres (U-91-WC-687m, U-95-WC-280p, and U-01-HL-0164m). Results from these projects include the recordation of one historic refuse dump (42Dv51) and two prehistoric isolates, all determined ineligible for listing in the NRHP. Inventory efforts have resulted in the survey of 12.5 percent of the total area of Hill AFB. None of the previous inventories fall within the APE of the current proposed project.

Building development and associated infrastructure will encompass the entire APE of the current project. Given the lack of previous findings and the extensive development and disturbance of Hill AFB, the potential for archaeological historic properties is extremely low. However, if any archaeological resources are found during construction, ground-disturbing activities in the immediate vicinity will cease, the Hill AFB Cultural Resources Program will be notified, and the unanticipated discovery of archaeological deposits procedures shall be

implemented with direction from the Hill AFB Cultural Resources Program and in accordance with the Hill AFB Integrated Cultural Resources Management Plan (Attachment 3, Unanticipated Discovery of Archaeological Deposits).

Therefore, Hill AFB has determined the proposed project will have no effect to historic properties [36 CFR §800.4(d)(1)]. I request your concurrence in these determinations as specified in 36 CFR §800.

An Environmental Assessment has been prepared for the proposed CDC and maintenance facility. If you would like a copy of this document to review, or should you or your staff have any questions about the project, please contact our archaeologist, Ms. Jaynie Hirschi, 75 CEG/CEVOR, at (801) 775-6920 or at jaynie.hirschi@hill.af.mil.

Sincerely

W. ROBERT JAMES, Ph.D., P.E.

Chief, Environmental Management Division

75th Civil Engineer Group

Attachments:

- Area of Potential Effect for the Proposed Child Development Center, Hill Air Force Base, Utah
- 2. Area of Potential Effect for the Proposed Maintenance Facility, Hill Air Force Base, Utah
- 3. Unanticipated Discovery of Archaeological Deposits

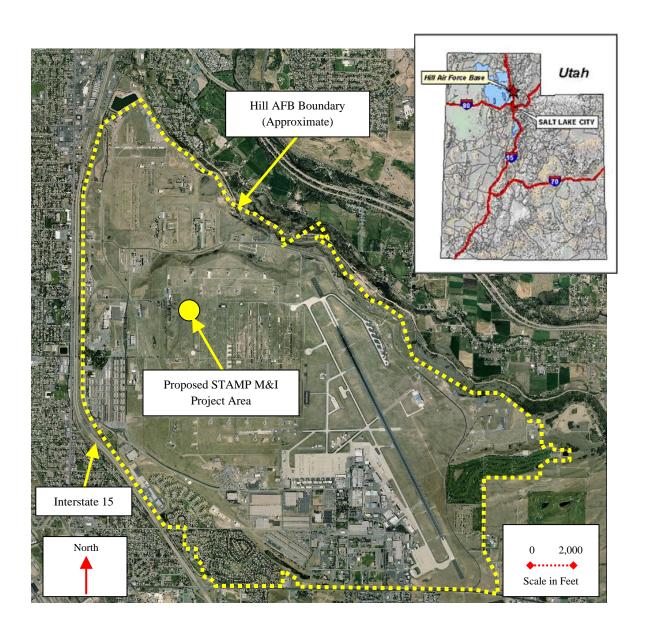


Figure 1: Location of the Proposed Action on Hill AFB

Standard Operating Procedure

UNANTICIPATED DISCOVERY OF ARCHAEOLOGICAL DEPOSITS

APPLICABLE LAWS AND REGULATIONS

- National Historic Preservation Act
- National Environmental Policy Act
- Native American Graves Protection and Repatriation Act
- ◆ AFI 32–7065 (June 2004), Cultural Resources Management Program

OVERVIEW

All undertakings that disturb the ground surface have the potential to discover buried and previously unknown archaeological deposits. The accidental discoveries of archaeological deposits during an undertaking can include but are not limited to:

- Undiscovered/undocumented structural and engineering features; and
- Undiscovered/undocumented archaeological resources such as foundation remains, burials, artifacts, or other evidence of human occupation.

POLICY

When cultural resources are discovered during the construction of any undertaking or ground-disturbing activities, Hill AFB shall:

- Evaluate such deposits for NRHP eligibility.
- Treat the site as potentially eligible and avoid the site insofar as possible until an NRHP eligibility determination is made.
- Make reasonable efforts to minimize harm to the property until the Section 106 process is completed.
- ♦ The BHPO will ensure that the provisions of NAGPRA are implemented first if any unanticipated discovery includes human remains, funerary objects, or American Indian sacred objects (see SOP #6).

PROCEDURE

Step 1: Work shall cease in the area of the discovery (Figure 5-5). Work may continue in other areas.

 The property is to be treated as eligible and avoided until an eligibility determination is made. Hill AFB will continue to make reasonable efforts to avoid or minimize harm to

Further construction activities in the vicinity of the site will be suspended until an agreed-upon testing strategy has been carried out and sufficient data have been gathered to allow a determination of eligibility. The size of the area in which work should be stopped shall be determined in consultation with the **BHPO**.

the property until the Section 106 process is completed.

Step 2: Immediately following the discovery, the **Project Manager** shall notify the installation **BHPO**.

Step 3: The **BHPO** or a professional archaeologist shall make a field evaluation of the context of the deposit and its probable age and significance, record the findings in writing, and document with appropriate photographs and drawings.

- If disturbance of the deposits is minimal and the excavation can be relocated to avoid the site, the **BHPO** will file appropriate site forms in a routine manner.
- If the excavation cannot be relocated, the **BHPO** shall notify the office of the **SHPO** to report the discovery and to initiate an expedited consultation.

The Section 106 review process is initiated at this point.

- If the deposits are determined to be ineligible for inclusion in the NRHP, then Hill AFB **BHPO** will prepare a memorandum for record and the construction may proceed.
- If the existing information is inadequate for an NRHP eligibility determination, Hill AFB **BHPO** shall develop an emergency testing plan in coordination with the SHPO.

Step 4: Hill AFB shall have qualified personnel conduct test excavations of the deposits to determine NRHP eligibility.

- Hill AFB BHPO, in consultation with the SHPO, will determine appropriate methodology for NRHP eligibility determination.
- If the SHPO and Hill AFB agree that the deposits are ineligible for inclusion in the NRHP, then work on the undertaking may proceed.
- If the deposits appear to be eligible, or Hill AFB and the SHPO cannot agree on the question of eligibility, then Hill AFB shall implement alternative actions, depending on the urgency of the proposed action.
 - Hill AFB may relocate the project to avoid the adverse effect.
 - Hill AFB may request the Keeper of the National Register to provide a determination.
 - Hill AFB may proceed with a data recovery plan under a MOA developed in coordination with the SHPO and possibly the ACHP and interested parties.
 - Hill AFB may request comments from the ACHP and may develop and implement actions that take into account the effects of the undertaking on the property to the extent feasible and the comments of the SHPO, ACHP, and interested parties. Interim comments must be provided to Hill AFB within 48 hours; final comments must be provided within 30 days.

